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May 17, 2021

**VIA ECF**

Hon. John P. Cronan  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 20C  
New York, NY 10007

Re: *DeCastro, et al v. City of New York. et al.*, No. 16-cv-3850

Your Honor:

The parties jointly request that the Court grant them an additional stay of the proceedings in this case for thirty (30) days so that they may continue to work towards a final settlement of this matter.

On March 30, 2021, the parties jointly requested that the Court adjourn *sine die* all pending motions and conferences as the parties had reached agreement in principle as to a proposed settlement of the plaintiffs' claims. Dkt. No. 202. On March 30, 2021, the Court granted this application and directed the parties to file a letter by May 17, 2021 updating the

Court as to the status of settlement discussions. Dkt. No. 203. This letter is submitted in accordance with the Court's direction.

On April 14, 2021, counsel for the plaintiffs provided time records as part of the negotiation towards a resolution of the claim for attorneys' fees. On April 23, 2021, defense counsel requested that plaintiffs' counsel provide background information regarding the individuals listed in the time records of Harris, St. Laurent, and Wechsler LLP. That background information was provided by plaintiffs' counsel on April 26, 2021. Notwithstanding the parties' efforts to date, the parties have not yet been able to reach final settlement.

The parties believe that if this application is granted that they will be able to reach a final settlement. Accordingly, the parties jointly request a stay of an additional thirty (30) days. Thank you for your consideration of this request.

Respectfully submitted:

Andrew St. Laurent  
Joseph Gallagher  
Daniel Ackman  
*Attorneys for Plaintiffs*

Karen B. Selvin  
*Counsel for Defendants*

This case is stayed pending settlement discussions. The parties shall submit an update by June 16, 2021.

SO ORDERED.

Date: May 17, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge